

**Coleman, Charles**

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**From:** Coleman, Charles  
**Sent:** Monday, September 14, 2015 1:08 PM  
**To:** 'Pokorny, Luke N (Luke.Pokorny@bp.com)'; shannon.dunlap@bp.com; Kevin Bethke; jpd@prrlaw.com; 'Kelley, Jill (Kelly Services)'; dlogan@pioneer-technical.com; Cord Harris  
**Cc:** Lensink, Andy; Haque-Hausrath, Katherine; Ken Brockman (kbrockman@usbr.gov); Chavez, Joel; Emilsson, Gunnar; Carl Nyman  
**Subject:** FW: CSOU Opportunity ISWPs  
**Attachments:** DOC.PDF

-----Original Message-----

**From:** Coleman.Charles@epamail.epa.gov [mailto:Coleman.Charles@epamail.epa.gov]  
**Sent:** Monday, September 14, 2015 7:04 AM  
**To:** Coleman, Charles <Coleman.Charles@epa.gov>  
**Subject:** CSOU Opportunity ISWPs

Please open the attached document. It was scanned and sent to you using a Xerox WorkCentre.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8, MONTANA OFFICE  
FEDERAL BUILDING, 10 W. 15<sup>th</sup> STREET, SUITE 3200  
HELENA, MONTANA 59626

Ref: 8MO

September 14, 2015

Mr. Luke Pokorny  
Atlantic Richfield Company  
317 Anaconda Road  
Butte, Montana 59701

Dear Luke:

EPA, in consultation with DEQ, approves, with comment, Atlantic Richfield's *Community Soils Operable Unit (CSOU) Opportunity Individual Site Work plans (ISWPs)*, dated August 28, 2015. EPA plans to issue a Unilateral Administrative Order to Atlantic Richfield shortly. Atlantic Richfield may proceed with RA planning activities.

If you have any questions, please give me a call.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles Coleman", is written over a horizontal line.

Charles Coleman  
Anaconda Project Manager

cc: Andy Lensink, ENF-L  
Joel Chavez, DEQ  
Katherine-Haque-Hausrath, DEQ  
Ken Brockman, BOR  
Gunnar Emilsson, CDM  
Connie Daniels, ADL

AR: Cord Harris, AR  
Shannon Dunlap, AR  
Jill Kelley, AR  
John Davis, PRR  
Kevin Bethke, TREC  
Duane Logan, PTS



**Comments to the Opportunity Area Individual Site Work Plans  
Community Soils Operable Unit, Anaconda Smelter NPL Site  
Prepared for Atlantic Richfield Company by Pioneer Technical Services, Inc.  
August 28, 2015**

General Comments

The Individual Site Work Plans (ISWPs) were submitted to the U.S. Environmental Protection Agency (EPA) by the Atlantic Richfield Company (Atlantic Richfield) as a result of sampling conducted by Atlantic Richfield in response to litigation being pursued by a group of landowners in the community of Opportunity. This sampling was conducted without EPA oversight or approved Sampling and Analysis Plans (SAPs). In 2013, Atlantic Richfield submitted two data validation summary reports documenting the SAP, analytical laboratory data, and data validation activities:

- Data Validation Summary Report, Opportunity Residential Soils Sampling Results, Anaconda Smelter NPL Site. Prepared by Portage Inc., for Pioneer Technical Services, Anaconda, MT. October 2012
- Data Validation Summary Report, Opportunity Residential Soils Sampling Results, Anaconda Smelter NPL Site. Prepared by Portage Inc., for Pioneer Technical Services, Anaconda, MT. June 2013

EPA and DEQ completed reviews (attached) of these data validation summary reports and found the data to be of enforcement quality.

The Residential ISWPs consist of twenty-seven (27) residential properties where the area-weighted average arsenic concentration or component lead concentration in one of the 4 depth increments (0 to 2, 2 to 6, 5 to 12, and 12 to 18 inches) in the top 18 inches were determined to be greater than the residential cleanup action level (250 mg/kg arsenic and 400 mg/kg lead). The logic used in selecting the remedies proposed in the ISWPs is in accordance with the recently *approved Final Community Soils OU Residential Soils/Dust Remedial Action Work Plan/Final Design Report* dated August 7, 2015. As such these ISWPs can be approved with the following comment:

1. The design drawings continue to use the 125 foot circular radius from the centroid of the residence to demark the maximum extent of remediation. As was discussed in previous technical meetings, and agreed to by Atlantic Richfield, it makes more sense to base remediation units on the actual yard component, especially in the community of Opportunity where residential lots are reasonably well defined. Use of the 125 foot radius should be limited to true rural settings where yard components are not defined, such as a cabin surrounded by native vegetation with no lawn. The remedial units should be determined through the initial pre-construction walkthrough with the Agencies prior to construction.

End of comments.